*BELL*SOUTH

BellSouth Corporation
Suite 900
1133-21st Street, N.W.
Washington, DC 20036-3351

kathleen.levitz@bellsouth.com

Kathleen B. Levitz
Vice President-Federal Regulatory

202 463 4113
Fax 202 463 4198

March 12, 2002

Mr. William Caton
Secretary
Federal Communications Commission
The Portals
445 12th Street, S.W.
Washington, D.C. 20554

<center>Re: CC Docket No. 02-35</center>

Dear Mr. Caton:

This is to inform you that on March 11, 2002, Dennis Davis, Bennett Ross, Ernest Bush, Jonathan Banks, Glenn Reynolds and I, representing BellSouth, met with Renee Crittendon, Ian Dillner and Daniel Shiman of the Commission's Common Carrier Bureau. The purpose of the meeting was to discuss BellSouth's change control process and modifications to that process that BellSouth has made or proposed to make in response to requests from its CLEC customers. The attached documents formed the basis for that presentation.

In accordance with Section 1.1206, I am filing two copies of this notice and the accompanying attachments and request that you place them in the record of the proceeding identified above. Thank you.

Sincerely,

Kathleen B. Levitz

Attachments

cc: Renee Crittendon
       Ian Dillner
       Daniel Shiman
       Susan Pié
       James Davis-Smith

PRELIMINARY FEATURE SIZING MODEL FOR CCP PRIORITIZATION PLANNING

CR Number :	DESCRIPTION:		Draft User Requirement: (Y/N)	Synergies with Other Related CRs
Type CR:				
Systems	System impacted Y/N	Level of Work Effort: List Number of Units. (incremental units in quarters is permissable) 1 Unit=100 Release Cycle Hours	Constraints/ Comments	Integrated Testing Required (Y/N)
LENS				
TAG				
EDI				
LESOG				
LNP				
SGG				
DOM				
Other (List each)				
Total Units				

3/12/02

CCP
Release Capacity Planning
Proposal

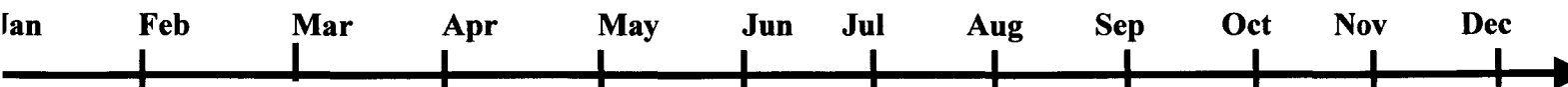2/12/02

Release Capacity Planning Proposal

- 3-4 Releases annually (plus maintenance releases)
- Type 2,3,6 Features scheduled prior to Type 4s & 5s
- Provide Release Capacity Measurement Feature Prioritization Matrix (See Release Capacity Measurement Feature Prioritization Matrix Example)
- Provide Forecasted Release Capacity:
  - Estimated capacity assigned to Types 2-6 features provided at time of prioritization (i.e., quarterly)
  - Capacity remaining after assigning Types 2-6 used for slotting Type 4s/5s at time of prioritization
  - 50%/50% approximate capacity split between Type 4s and 5s, implement Type 4s/5s w/i 60 weeks subject to available capacity
- Provide Features planned via Release Schedule. (see CCP Feature Release Implementation Schedule Example)
- Provide Monitoring and Reporting Post-Release Capacity Utilization depicting actual capacity utilized (see Appendix I Example)

* LEGEND: Type 2: Mandates, Type 3: Industry Standards, Type 4: BST Initiated, Type 5: CLEC Initiated, Type 6: Defects

Release Capacity Measurement
Feature Prioritization Matrix

CR Number:	DESCRIPTION:		Draft User Requirement: (Y/N)	Synergies with Other Related CRs
Type CR:				
Systems	System impacted Y/N	Level of Work Effort: List Number of Units. (incremental units in quarters is permissable) 1 Unit=100 Release Cycle Hours	Constraints/ Comments	Integrated Testing Required (Y/N)
LENS				
TAG				
EDI				
LESOG				
LNP				
SGG				
DOM				
Other (List each)				
Total Units				

CCP Feature Release Implementation Schedule

2002

Jan   Feb   Mar   Apr   May   Jun   Jul   Aug   Sep   Oct   Nov   Dec

◆ 1/5/02 Minor Release 10.3 Production (CAVE)
- Parsed CSR – (CR0369)-2
- Mechanized Line Splitting – (CR0441)-2
- New Install with No Prior Service at Location – (CR0229)- CCP Prioritized April 2001- 4
- Line Splitting-Remove Edit in LMU Prohibiting CLEC from Receiving Loop Data (CR0409)-2
- Mechanized LMU Fix-LFACS/RSAG Address Mismatch Results in Neighborhood Report (CR0422)-2

◆◆ 2/2/02 Maintenance Release 10.3.1
- Allow Electronic processing of Unbundled Universal Digital Channel(UDC) Loop Orders-(CCP FTTF)-(CR0557)-2
- Unable to View BTN, PSO, LSF &Directory Information on LENS CSR- (CR0459)-6
- Validation on TN vs Address Req Types A and E (formerly EDI1215990001)-(CR0371)-5
- LENS/TAG miscalculation of UNE P Due Dates -(CR0520) -6
- Enhancements to hunting-(CR0606)-4
- Phase 1-Order Tracking-(CR0040)-CCP Prioritized April 2001-#1-5

◆◆ **3/23/02-3/234/02 Minor Release 10.4 Production**
- **SI Enhancement for SL1, SL2, DS0, DS1 and ISDN -(CR0016)-CCP Prioritized April 2001 -5**
- **Flow thru Request Type CB, Act of P and Q-(CR137)-CCP Prioritized April 2001 –2,5**
- **Remove a TN from a LENS LSR-(CR0145)-CCP Prioritized April 2001 -4**
- **Add Ability to Create New Listings in LENS-(CR0096)- CCP Prioritized April 2001-5**
- **Local Service Freeze-(CR)-2**

◆◆ **5/18/02-5/19/02   Minor Release 10.5 Production (CAVE)**
- **LSRs in Q Status-Do Not Display Error Message on SUPP- CCP/FTTF -(CR 0494)-2**
- **Provide CFA via pre-order (formerly TAG0812990001)- (CR 0368)-CCP Prioritized April 2001 - 5**
- **Change Main Account Number-(CR0365)-CCP Prioritized April 2001 -5**
- **Extended Loops (EELS)-(CR0078)-CCP Prioritized April 2001 –2,5**
- **View Multiple CSR s Simultaneously-(CR0020)-CCP Prioritized April 2001 -5**
- **TOS Field on REQTYP J-(CR0038)-CCP Prioritized April 2001 -4**

LEGEND

Underlined and Not Bold = Completed Release Cycle

◆◆ **7/13/02-7/14/02   Minor Release 10.6 Production**
- **Partial Migration of UNE Loops (REQTYP A)-(CR0029)-CCP Prioritized April 2001-2,4**
- **CN Returned on Incorrect LSR Version-(CR0241)- CCP Prioritized April 2001-5**
- **Allow Changes in Directory Deliveries-(CR0196)-CCP Prioritized April 2001-4**

Bold = Release Cycle in progress

Italicized and not Bold = Release Cycle not in progress

NOTE: Feature justification are in parentheses:

Mandates= Type 2 , Standards = Type 3, BST Initiated CR = Type 4, CLEC Initiated
CR= Type 5

◆◆ *11/16/02 – 11/17/02 Major Release 11.Production (CAVE)*
- *TARGETED ITEM-UNE to UNE Bulk Migrations-CR0215- CCP Prioritized April 2001-5*
- *TARGETED ITEM-Phase 2-Order Tracking CCP Prioritized April 2001-5*

CAVE) = Must be tested in CAVE prior to this date:4wks Major/2wks Minor if
applicable; CLEC Testing will begin on the Monday following CAVE implementation

"CLEC Proposal"
Appendix I: <u>Monitoring and Reporting Post-Release Capacity Utilization</u>

Categories	1Q		2Q		3Q		4Q		YTD / EOY	
	Units	%	Units	%	Units	%	Units	%	Units	%
Maintenance										
PSN Mandate (Type 2)										
Regulatory (Type 2)										
Defects (Type 6)										
Industry (Type 3)										
BellSouth (Type 4)										
CLEC (Type 5)										
Total										

Annual Release Capacity Utilization – YTD Quarterly Report

CCP

Release Capacity Planning

Proposal

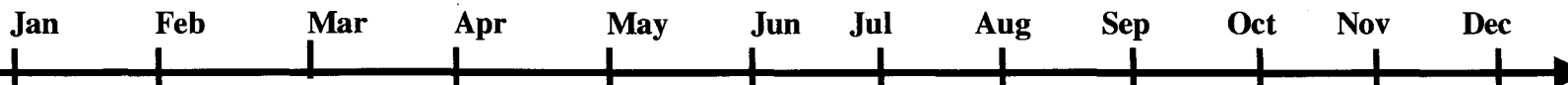2/12/02

Release Capacity Planning Proposal

- 3-4 Releases annually (plus maintenance releases)
- Type 2,3,6 Features scheduled prior to Type 4s & 5s
- Provide Release Capacity Measurement Feature Prioritization Matrix (See Release Capacity Measurement Feature Prioritization Matrix Example)
- Provide Forecasted Release Capacity:
  - Estimated capacity assigned to Types 2-6 features provided at time of prioritization (i.e., quarterly)
  - Capacity remaining after assigning Types 2-6 used for slotting Type 4s/5s at time of prioritization
  - 50%/50% approximate capacity split between Type 4s and 5s, implement Type 4s/5s w/i 60 weeks subject to available capacity
- Provide Features planned via Release Schedule. (see CCP Feature Release Implementation Schedule Example)
- Provide Monitoring and Reporting Post-Release Capacity Utilization depicting actual capacity utilized (see Appendix I Example)

* LEGEND: Type 2: Mandates, Type 3: Industry Standards, Type 4: BST Initiated, Type 5: CLEC Initiated, Type 6: Defects

Release Capacity Measurement
Feature Prioritization Matrix

CR Number :	DESCRIPTION:			Draft User Requirement: (Y/N)	Synergies with Other Related CRs
Type CR:					
Systems	System impacted Y/N	Level of Work Effort: List Number of Units. (incremental units in quarters is permissable) 1 Unit=100 Release Cycle Hours		Constraints/ Comments	Integrated Testing Required (Y/N)
LENS					
TAG					
EDI					
LESOG					
LNP					
SGG					
DOM					
Other (List each)					
Total Units					

CCP Feature Release Implementation Schedule

2002

Jan　Feb　Mar　Apr　May　Jun　Jul　Aug　Sep　Oct　Nov　Dec

1/5/02 Minor Release 10.3 Production (CAVE)
- Parsed CSR – (CR0369)-2
- Mechanized Line Splitting – (CR0441)-2
- New Install with No Prior Service at Location – (CR0229)- CCP Prioritized April 2001- 4
- Line Splitting-Remove Edit in LMU Prohibiting CLEC from Receiving Loop Data (CR0409)-2
- Mechanized LMU Fix-LFACS/RSAG Address Mismatch Results in Neighborhood Report (CR0422)-2

2/2/02 Maintenance Release 10.3.1
- Allow Electronic processing of Unbundled Universal Digital Channel(UDC) Loop Orders-(CCP FTTF)-(CR0557)-2
- Unable to View BTN, PSO, LSF &Directory Information on LENS CSR- (CR0459)-6
- Validation on TN vs Address Req Types A and E (formerly EDI1215990001)-(CR0371)-5
- LENS/TAG miscalculation of UNE P Due Dates -(CR0520) -6
- Enhancements to hunting-(CR0606)-4
- Phase 1-Order Tracking-(CR0040)-CCP Prioritized April 2001-#1-5

3/23/02-3/234/02 Minor Release 10.4 Production
- **SI Enhancement for SL1, SL2, DS0, DS1 and ISDN -(CR0016)-CCP Prioritized April 2001 -5**
- **Flow thru Request Type CB, Act of P and Q-(CR137)-CCP Prioritized April 2001 –2,5**
- **Remove a TN from a LENS LSR-(CR0145)-CCP Prioritized April 2001 -4**
- **Add Ability to Create New Listings in LENS-(CR0096)- CCP Prioritized April 2001-5**
- **Local Service Freeze-(CR)-2**

"TARGETED" - the planning work to include this item in the indicated release is ongoing. A final determination as to whether the item will be included in the release has not been made. Factors such as regulatory mandates, information uncovered in further planning efforts, or other unforeseen circumstances may impact whether the item will be included in the indicated release.

5/18/02-5/19/02   Minor Release 10.5 Production (CAVE)
- **LSRs in Q Status-Do Not Display Error Message on SUPP- CCP/FTTF -(CR 0494)-2**
- **Provide CFA via pre-order (formerly TAG0812990001)- (CR 0368)-CCP Prioritized April 2001 - 5**
- **Change Main Account Number-(CR0365)-CCP Prioritized April 2001 -5**
- **Extended Loops (EELS)-(CR0078)-CCP Prioritized April 2001 –2,5**
- **View Multiple CSR s Simultaneously-(CR0020)-CCP Prioritized April 2001 -5**
- **TOS Field on REQTYP J-(CR0038)-CCP Prioritized April 2001 -4**

7/13/02-7/14/02   Minor Release 10.6 Production
- **Partial Migration of UNE Loops (REQTYP A)-(CR0029)-CCP Prioritized April 2001-2,4**
- **CN Returned on Incorrect LSR Version-(CR0241)- CCP Prioritized April 2001-5**
- **Allow Changes in Directory Deliveries-(CR0196)-CCP Prioritized April 2001-4**

LEGEND

- Underlined and Not Bold = Completed Release Cycle

- **Bold = Release Cycle in progress**

-*Italicized and not Bold = Release Cycle not in progress*

-NOTE: Feature justification are in parentheses:

Mandates= Type 2 , Standards = Type 3, BST Initiated CR = Type 4, CLEC Initiated CR= Type 5

(CAVE) = Must be tested in CAVE prior to this date:4wks Major/2wks Minor if applicable; CLEC Testing will begin on the Monday following CAVE implementation

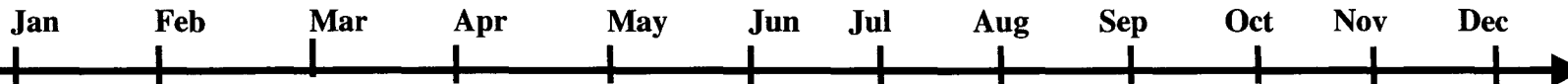*11/16/02 – 11/17/02 Major Release 11.Production (CAVE)*
- *TARGETED ITEM-UNE to UNE Bulk Migrations-CR0215- CCP Prioritized April 2001-5*
- *TARGETED ITEM-Phase 2-Order Tracking CCP Prioritized April 2001-5*

CCP

2/11/02

"CLEC Proposal"
Appendix I: <u>Monitoring and Reporting Post-Release Capacity Utilization</u>

Annual Release Capacity Utilization – YTD Quarterly Report										
Categories	1Q		2Q		3Q		4Q		YTD / EOY	
	Units	%	Units	%	Units	%	Units	%	Units	%
Maintenance										
PSN Mandate (Type 2)										
Regulatory (Type 2)										
Defects (Type 6)										
Industry (Type 3)										
BellSouth (Type 4)										
CLEC (Type 5)										
Total										

CCP Feature Release Implementation Schedule

2002

Jan Feb Mar Apr May Jun Jul Aug Sep Oct Nov Dec

1/5/02 Minor Release 10.3 Production (CAVE)
- Parsed CSR – (CR0369)-2
- Mechanized Line Splitting – (CR0441)-2
- New Install with No Prior Service at Location – (CR0229)- CCP Prioritized April 2001- 4
- Line Splitting-Remove Edit in LMU Prohibiting CLEC from Receiving Loop Data (CR0409)-2
- Mechanized LMU Fix-LFACS/RSAG Address Mismatch Results in Neighborhood Report (CR0422)-2

"TARGETED" - the planning work to include this item in the indicated release is ongoing. A final determination as to whether the item will be included in the release has not been made. Factors such as regulatory mandates, information uncovered in further planning efforts, or other unforeseen circumstances may impact whether the item will be included in the indicated release.

2/2/02 Maintenance Release 10.3.1
- Allow Electronic processing of Unbundled Universal Digital Channel(UDC) Loop Orders-(CCP FTTF)-(CR0557)-2
- Unable to View BTN, PSO, LSF &Directory Information on LENS CSR- (CR0459)-6
- Validation on TN vs Address Req Types A and E (formerly EDI1215990001)-(CR0371)-5
- LENS/TAG miscalculation of UNE P Due Dates -(CR0520) -6
- Enhancements to hunting-(CR0606)-4
- Phase 1a-Order Tracking-(CR0040)-CCP Prioritized April 2001-#1-5

3/23/02-3/24/02 Minor Release 10.4 Production
- **SI Enhancement for SL1, SL2, DS0, DS1 and ISDN -(CR0016)-CCP Prioritized April 2001 -5**
- **Flow thru Request Type CB, Act of P and Q-(CR137)-CCP Prioritized April 2001 –2,5**
- **Remove a TN from a LENS LSR-(CR0145)-CCP Prioritized April 2001 -4**
- **Add Ability to Create New Listings in LENS-(CR0096)- CCP Prioritized April 2001-5**
- **Local Service Freeze-Availability for REQTYP M Non-Complex (CR0657)-2**
- **Single C-2**
- **TARGETED-Parsed CSR - Hunting (CR0651)-5**
- **TARGETED-Phase 1b-Order Tracking-(CR0040)-CCP Prioritized April 2001-#1-5**

5/18/02-5/19/02 Minor Release 10.5 Production (CAVE)
- **LSRs in Q Status-Do Not Display Error Message on SUPP- CCP/FTTF -(CR 0494)-2**
- **Provide CFA via pre-order (formerly TAG0812990001)- (CR 0368)-CCP Prioritized April 2001 - 5**
- **Change Main Account Number-(CR0365)-CCP Prioritized April 2001 -5**
- **Extended Loops (EELS)-(CR0078)-CCP Prioritized April 2001 –2,5**
- **View Multiple CSR s Simultaneously-(CR0020)-CCP Prioritized April 2001 -5**
- **TOS Field on REQTYP J-(CR0038)-CCP Prioritized April 2001 –4**
- **TARGETED-Phase 2a-Order Tracking-(CR0040)-CCP Prioritized April 2001-#1-5**

7/13/02-7/14/02 Minor Release 10.6 Production
- **Partial Migration of UNE Loops (REQTYP A)-(CR0029)-CCP Prioritized April 2001-2,4**
- **CN Returned on Incorrect LSR Version-(CR0241)- CCP Prioritized April 2001-5**
- **Allow Changes in Directory Deliveries-(CR0196)-CCP Prioritized April 2001-4**

11/16/02 – 11/17/02 Major Release 11.0.Production (CAVE)
- **UNE to UNE Bulk Migrations-CR0215- CCP Prioritized April 2001-5**
- **ACT of T- CR0228-2,4**
- **LENS to Flow-Thru Coin LSRs-CR0492-2**
- **Phase 2b-Order Tracking CCP Prioritized-(CR0040)- April 2001-5**

LEGEND

- Underlined and Not Bold = Completed Release Cycle

- **Bold = Release Cycle in progress**

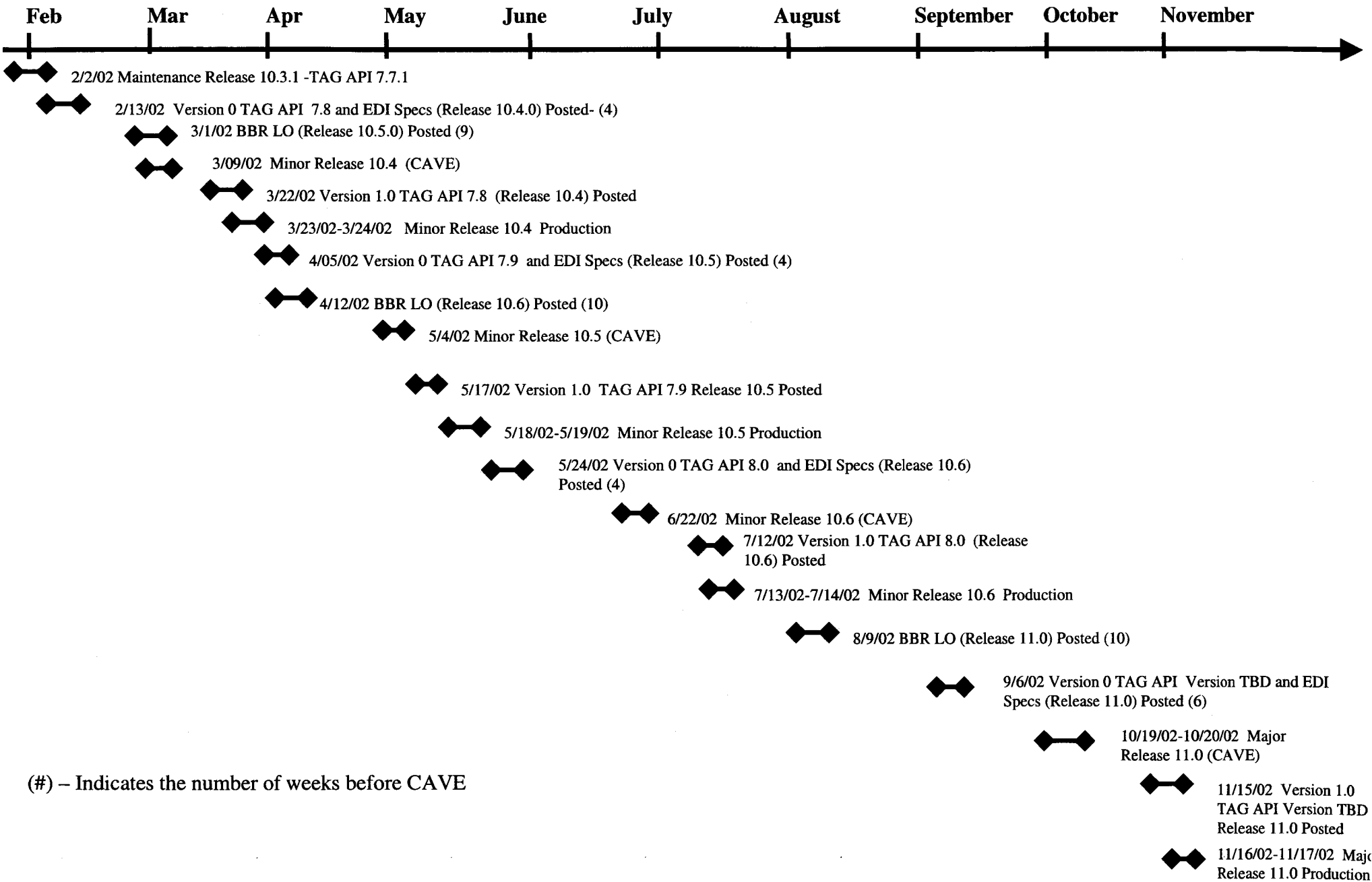- *Italicized and not Bold = Release Cycle not in progress*

-NOTE: Feature justification are in parentheses:

Mandates= Type 2 , Standards = Type 3, BST Initiated CR = Type 4, CLEC Initiated CR= Type 5

(CAVE) = Must be tested in CAVE prior to this date:4wks Major/2wks Minor if applicable; CLEC Testing will begin on the Monday following CAVE implementation

CCP

2/26/02

1st – 4th Quarter Release Deliverables

2002

Feb	Mar	Apr	May	June	July	August	September	October	November

2/2/02 Maintenance Release 10.3.1 -TAG API 7.7.1

2/13/02 Version 0 TAG API 7.8 and EDI Specs (Release 10.4.0) Posted- (4)

3/1/02 BBR LO (Release 10.5.0) Posted (9)

3/09/02 Minor Release 10.4 (CAVE)

3/22/02 Version 1.0 TAG API 7.8 (Release 10.4) Posted

3/23/02-3/24/02 Minor Release 10.4 Production

4/05/02 Version 0 TAG API 7.9 and EDI Specs (Release 10.5) Posted (4)

4/12/02 BBR LO (Release 10.6) Posted (10)

5/4/02 Minor Release 10.5 (CAVE)

5/17/02 Version 1.0 TAG API 7.9 Release 10.5 Posted

5/18/02-5/19/02 Minor Release 10.5 Production

5/24/02 Version 0 TAG API 8.0 and EDI Specs (Release 10.6) Posted (4)

6/22/02 Minor Release 10.6 (CAVE)

7/12/02 Version 1.0 TAG API 8.0 (Release 10.6) Posted

7/13/02-7/14/02 Minor Release 10.6 Production

8/9/02 BBR LO (Release 11.0) Posted (10)

9/6/02 Version 0 TAG API Version TBD and EDI Specs (Release 11.0) Posted (6)

10/19/02-10/20/02 Major Release 11.0 (CAVE)

(#) – Indicates the number of weeks before CAVE

11/15/02 Version 1.0 TAG API Version TBD Release 11.0 Posted

11/16/02-11/17/02 Majo Release 11.0 Production

BellSouth's Change Management Process

Dennis Davis

Bennett Ross

February 11, 2002

FCC's Evaluation of Change Management Plan

- Information is clearly organized and readily accessible
- Competing carriers had substantial input in the design and continued operation of the process
- The plan defines a procedure for the timely resolution of change management disputes
- The availability of a stable testing environment that mirrors production
- The efficacy of the documentation the BOC makes available for the purpose of building an electronic gateway
- Whether the BOC has demonstrated a pattern of compliance with the plan

2

Information is Clearly Organized and Readily Accessible

- **Change Control Website**
  - www.interconnection.bellsouth.com/markets/lec/ccp
    - Release Notification/Schedule Change Request Log
      - Change Request Forms (Electronic)
        - Change Request Status Updates
          - System Outage Notifications
      - Process Document (Including Version History)
        - Meeting Notification and Minutes
          - Monthly Meeting Calendar
    - Daily Updates – Activity Log – Emailed & CCP
          - Process Document
          - Version History of Change
    - Measurement Tools
    - View of Capacity Used (Proposed)

3

ompeting Carriers Have Substantial in Design and Operation of Process

as Evolved – Numerous Revisions in 2000 and 2001

Management Process Overhauled at CLEC Request

Workshops

oted on 67 Revisions to the Process

ocess is Result of Input from All CCP Members

4

CCP Contains Clear Escalation & Dispute Resolution Procedures

Escalation Process

◆ Description of Process

Limited Usage in 2001

Will Offer Expanded Escalation List (V.P. Operations

ute Resolution

ediation

mplaint Process

The CAVE Testing Environment Is Stable and Mirrors Production

- CAVE Used by Nine CLECs and Vendors
  - ★ No Major Issues
- Test Environment Mirrors Production

Documentation for Building Gateways is Good

- An average of 35 CLECs use EDI Monthly
- An average of 65 CLECs use TAG Monthly

7

BellSouth Has Demonstrated a Pattern of Compliance with the Process

- Overall Process is Working Well
- CLECs' Claims of "Backlog" Misrepresent the Process
- Change Requests are Handled on a Timely Basis

  Change Requests are Implemented

  Existing and New CCP Performance Measures

Release Capacity Planning Proposal

- 3-4 Releases Annually
- Type 2,3, and 6 Feature Scheduled Prior to Type 4 & 5
- Provide Release Capacity Measurement Feature Prioritization Matrix
- Provide Forecasted Release Capacity
  - ◆ Estimated Capacity Assigned to Types 2-6 Feature Provided at Time of Prioritization
  - ◆ Capacity Remaining after Assigning Types 2-6 Used for Slotting Types 4s/5s at Time of Prioritization
  - ◆ 50/50 Approximate Capacity Split Between Type 4s and 5s, Implement Type 4s/5s w/I 60 Weeks Subject to Available Capacity

  Provide Features Planned via Release Schedule

  Provide Monitoring and Reporting Post-Release Capacity Utilization Depicting Actual Capacity Utilized

9